

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10213-NMG
)	
GEORGE L. MEDINA)	

ASSENTED TO MOTION TO CONTINUE SUPPRESSION HEARING

Defendant, George L. Medina, moves to continue the suppression hearing currently scheduled for June 29 to a date on or after July 12, 2006.

As grounds for this motion, defendant states the following. On the morning of May 18, 2006, immediately prior to a suppression hearing, the government revealed that it was in possession of exculpatory information pertaining to the circumstances surrounding the search of the premises that led to the discovery of evidence the defendant seeks to suppress. The potentially exculpatory evidence came to light during witness preparation interviews. As a result, the government requested, and the defendant consented to, a continuance to flush out the scope of the exculpatory information. On May 20, 2006, defendant submitted discovery requests pertaining to the newly discovered information. The defendant has just received the government's

response to this request along with the government's revised opposition to defendant's motion to suppress.¹

Defendant has not had an adequate time to review the new materials and determine if even further information is required. Accordingly, defendant requests a two week continuance in the suppression hearing in order to adequately digest the government's recent disclosures.

Defendant also moves that the time between June 29, 2006 and the next scheduled date be excluded from the speedy trial calculation.

The government, per Assistant United States Attorney Waqar Hasib, assents to this motion.

GEORGE L. MEDINA
By his attorney,

/s/ Stylianus Sinnis
Stylianus Sinnis
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June 26, 2006

¹ The documents were served on the defense on June 21, 2006, but defense counsel did not receive them until June 26 when he returned from Seattle after attending a national conference pertaining to the new Court Assisted Recovery Effort program recently initiated in this District.

CERTIFICATE OF SERVICE

I, Stylianus Sinnis, do hereby certify that this document has been filed electronically and that it will be served electronically to registered ECF participants as identified on the Notice of Electronic Filing (NEF) and by sending paper copies to non-registered participants all on June 26, 2006.

/s/ Stylianus Sinnis

Stylianus Sinnis